

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SONNY JOYCE, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R. JASSY,  
JEFFREY P. BEZOS, BRIAN T.  
OLSAVSKY, DAVID A. ZAPOLSKY, and  
NATE SUTTON,

Defendants,

Case No.: 2:22-cv-00617-JHC

**STIPULATED MOTION AND  
ORDER ACCEPTING SERVICE OF  
PROCESS AND EXTENDING TIME  
TO RESPOND TO COMPLAINT**

**NOTE ON MOTION CALENDAR:**  
**MAY 31, 2022**

**STIPULATED MOTION ACCEPTING SERVICE OF PROCESS AND EXTENDING  
TIME TO RESPOND TO COMPLAINT**

**WHEREAS**, On May 6, 2022, Plaintiff Sonny Joyce, individually and on behalf of all others similarly situated, filed a putative securities class action complaint (the “Complaint”) against defendants Amazon.com, Inc., Andrew R. Jassy, Jeffrey P. Bezos, Brian T. Olsavsky, David A. Zapolsky, and Nate Sutton (collectively, “Defendants”);

**WHEREAS**, no Defendant has been served with the Complaint;

**WHEREAS**, this putative class action asserts federal securities claims arising under the Securities Exchange Act of 1934, which is governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4 et seq.;

1       **WHEREAS**, the PSLRA provides a procedure for the appointment by the Court of a lead  
 2 plaintiff and lead counsel to represent the putative class pursuant to motion practice, for which  
 3 opening briefs are due to be filed no later than July 5, 2022, *see* 15 U.S.C. § 78u-4(a)(3);

4       **WHEREAS**, lead plaintiff and lead counsel will not be appointed until after the completion  
 5 of briefing on any lead plaintiff motions, and accordingly it is unclear at this time who will  
 6 ultimately have the authority to act on behalf of plaintiff and the putative class, and whether the  
 7 court-appointed lead plaintiff will file an amended complaint, a consolidated complaint, or stand  
 8 on the existing Complaint filed herein;

9       **WHEREAS**, no party has previously requested or received time for an extension to answer  
 10 or otherwise respond to the Complaint in the above-captioned action; and

11       **WHEREAS**, in order to avoid unnecessary expense to the parties and unnecessary  
 12 expenditure of time by the Court prior to the appointment of lead plaintiff and lead counsel and  
 13 the filing of an amended complaint, a consolidated complaint, or the designation of an operative  
 14 complaint, the parties have agreed, subject to the Court's approval, to set a schedule for the filing  
 15 of an amended or consolidated (or designation of an operative) complaint and Defendants'  
 16 responses thereto.

17       **IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned  
 18 counsel, and subject to Court approval, that:

19       1.       Undersigned counsel for Defendants are authorized to accept, and hereby do accept  
 20 effective as of the date of this Order, service of the summons and Complaint in this matter on  
 21 behalf of Defendants, without prejudice and without waiver of any of Defendants' defenses,  
 22 objections, or arguments, except as to sufficiency of service of process.

23       2.       Defendants are not required to answer, move against, or otherwise respond to the  
 24 Complaint unless it is designated as the operative complaint by the Court-appointed lead plaintiff  
 25 under the schedule below.

26       3.       The Court-appointed lead plaintiff shall have sixty (60) days after appointment to  
 27 file an amended or consolidated complaint or, alternatively, to designate the initial Complaint as  
 28 the operative complaint

4. Defendants shall answer, move against, or otherwise respond to the operative complaint within sixty (60) days after the Court-appointed lead plaintiff (a) files an amended or consolidated complaint, or (b) designates the initial Complaint as the operative complaint herein.

5. The Court-appointed lead plaintiff shall have sixty (60) days to oppose any motions Defendants may file to dismiss the operative complaint.

6. Defendants' replies shall be due forty-five (45) days after the filing of the Court-appointed lead plaintiff's opposition papers.

7. The provisions in this Stipulation shall apply to this action and any other action on behalf of a class asserting substantially the same claim or claims that is subsequently filed and coordinated or consolidated with this action.

Dated: May 31, 2022

Respectfully submitted,

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*Attorneys for Plaintiff*

**SO ORDERED.**

Dated this 1st day of June, 2022.

  
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THE HONORABLE JOHN H. CHUN  
United States District Judge

Presented by:

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